

PARTNERSHIP for AMERICA

**FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL**

2008 JUN 16 A 11: 57

REVISED

June 10, 2008

**Federal Elections Commission
999 E St., NW
Washington, DC 20463**

To Whom It May Concern:

This letter is in response to the compliant 'MUR 6010' to the Federal Elections Commission received on May 12, 2008.

We are sorry to see that the commission has been burdened with a complaint that is without factual basis and uses second hand information that is erroneous. We would like to take this opportunity provided to us to point out a few key facts and to correct misinformation provided to you in the complaint regarding actions by the Partnership for America (also DBA Partnership for the West).

Partnership staff did prepare a draft plan for an education effort "to highlight the candidates' positions on key issues." This is completely allowable for a 501(c)4 to undertake. But there was never an attempt to run an 'independent expenditure' effort for or against any candidate in the 4th District of California. Further, this draft plan was never funded, initiated, acted upon, or the subject of any communications to voters in the fourth district of California. Nor, was it authorized or approved by the Partnership's Board of Directors. Any activity that would be undertaken by the Partnership for any such education efforts is done under the guidance of counsel and would fully comply with the law.

We realize that there are strict and defined thresholds to trigger the set of rules that govern coordinated activity. As you know, to meet the threshold for coordination (11 CFR Ch. 1 sec. 109.21(d)(5)), there must be a public communication, as defined in 11 CFR 100.26 to mean any broadcast, cable or satellite communication that could be received by more than 50,000 people (i.e., 'electioneering communications'). As you can see, the draft education plan never intended to meet the threshold for electioneering communications and the Partnership did not make any such communications. In fact, the Partnership has made no public communications related to the candidates in the CA-4 election.

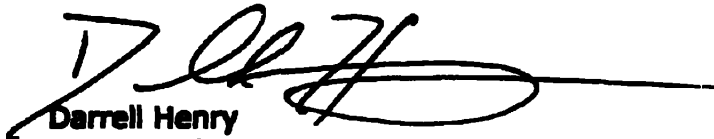
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Federal Elections Commission
June 10, 2008
Re: MUR 6010

In regard to Steve Ding, he is not an employee, agent or representative of the Partnership for America or Partnership for the West.

In conclusion, no funds were ever received from our membership (or new members) and to fund ANY actions related the candidates in the CA-4 Congressional election. In addition, the draft education plan was never approved or acted upon in any way. By default, the Partnership could not have violated any FEC coordination rules nor campaign spending limits. Therefore, the alleged FEC rules and campaign spending violations by the Partnership for America are just that...alleged, and without out a factual basis. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Henry', with a long horizontal line extending to the right.

Darrell Henry
Vice President,
Partnership for America

Partnership for America
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